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 Reactor Oversight Process Enhancement Initiative

**Comment On:** NRC-2019-0155-0001  
 Reactor Oversight Process Enhancement Initiative

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## General Comment

ROP Enhancement, docket ID NRC-2019-0155

Thank you for this opportunity to comment on the Reactor Oversight Process Enhancement Initiative. First, I need to point out that 'enhancement' is defined as "an increase or improvement in quality, value, or extent." I don't consider cutting back on inspections as enhancing procedures or security conditions. In fact, it's the opposite of enhancement.

Having participated in several NRC meetings during which the following topics were discussed - ROP, SONGS, Risk Informing Security, Visual Inspections, and Radiation protection, I observed that there are communications issues which NRC staff and industry staff need to improve upon. Without effective communications practices and 'tools' risks remain. I also observed that there seems to be a lack of interest in standardizing processes and practices. If 'enhancement' is truly what the agency seeks to achieve, I recommend working on communications skills and tools and move towards implementing International Standards Organization 'tools' and practices. These actions would go a long ways in improving ROPs.

When industry operators are found to be in violation of NRC guides, codes, policies, there must follow consequences, such as serious fines, to alert industry administrators to the fact that violations will not be tolerated. The role of the NRC is not to buddy up with industry, but is to act on behalf of the public which pays for the NRC's work to ensure safety is a priority.

I do not support the proposed ROP Enhancement Initiative because it is not, by definition, an enhancement.

Respectfully,

Pia Jensen  
former Cotati City Council member and Vice Mayor, 1996-2000